

# Exhibit 3

**From:** [Weinstein, Marc A.](#)  
**To:** [Dulberg, Andrew S.](#); [Oxford, Neil](#); [Maguire, Bill](#); [McGoey, John](#)  
**Cc:** [Neiman, Peter](#); [Maldonado, Sara A](#); [smccarthy@kostelanez.com](#); [Nicholas Bahnsen](#); [Daniel Davidson](#); [epeters@keker.com](#); [Julia L. Allen](#); [Sean K. Mullen](#); [tdewey](#); [Goldberg, David L.](#); [michael.rosensaft@katten.com](#)  
**Subject:** RE: SKAT - Pretrial Disclosures

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Drew, thanks for this note. I can confirm that we agree with the scope of expert testimony as described in your note.

Regards,  
Marc

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**From:** Dulberg, Andrew S. <Andrew.Dulberg@wilmerhale.com>  
**Sent:** Friday, May 10, 2024 3:14 PM  
**To:** Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>; Oxford, Neil <neil.oxford@hugheshubbard.com>; Maguire, Bill <bill.maguire@hugheshubbard.com>; McGoey, John <john.mcgoey@hugheshubbard.com>  
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**Subject:** SKAT - Pretrial Disclosures

**CAUTION: This email was sent by someone outside of the Firm.**

Marc,

Thank you for speaking earlier today. I can confirm the parties' agreement that in response to the Court's pretrial order, on May 15 and May 24, we will exchange the names of expert witnesses who the parties expect to call at trial and the subject matter of their testimony. As I said, certain defendants may also serve amended initial disclosures on May 15. At present, we have not identified any additional fact or expert witnesses who we intend to call at trial who have not previously been disclosed or deposed in this case, although we reserve our rights to do so.

With respect to expert testimony, as we discussed, both sides agree with the concept that expert witnesses who addressed specific trades may provide at trial certain testimony that encompasses the full set of trades now at issue in this trial even if those trades were not the explored in detail in their reports. It will be important to memorialize this agreement in a stipulation so that the parties are clear about the limits to which an expert may provide what would otherwise be undisclosed expert testimony at trial. Please confirm your agreement,

and we can work out the language of the stipulation in the weeks ahead.

Separately, you agreed to respond to our letter seeking information related to other litigation involving SKAT outside of the US early next week. We look forward to continuing that conversation, but in the meantime, request that SKAT promptly produce all witness statements, transcripts, and trial exhibits from the trial currently pending in the UK.

Regards,

Drew

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